and SWBT (as well as all other telcos). The standards provide the flexibility for the CLECs to functionally interface with each different incumbent local exchange carrier. The Electronic Bonding interface allows for the CLEC's operations system to flow trouble tickets to SWBT's operations system, thereby creating an Operations System to Operations System (OS-OS) communication. The context of this OS-OS interface flows from the CLEC's trouble management end system, through the CLEC's CMIP gateway, across a communications interconnect, up through SWBT's gateway to the SWBT's trouble management end-system. The communication protocol used for this interface is based on the International Standards Organization (ISO) Open System Interconnect (OSI), seven layer model using the Common Management Information Service Element (CMISE). The Special Services or designed services interface is working today. Joint testing of Electronic Bonding for POTS is underway between some CLECs and SWBT. Estimated service dates are first quarter 1998. Ms. Ham's affidavit provides more details on these interfaces and the development underway.

26. Upon receipt of manual trouble reports involving POTS lines, the LOC Customer Service Representatives enter the reports into the Enhanced Customer Report System (ECRs), which interfaces with SWBT's "back-office" systems involved in maintenance and repair. A metallic line test is performed, and the results are provided to the CLEC, along with a commitment time for restoration or repair of the service. The commitment times are provided via the "back office" systems and are based on maintenance report type (i.e., out of service, service effecting), class of service, work load, and work force availability. All POTS maintenance reports, whether for SWBT retail customers or for CLECs, are processed through the same "back office" systems; therefore, the same commitment time for restoration

or repair of service is provided to both our CLEC and retail customers. Again this process ensures that parity service is provided to the CLECs.

27. If the CLEC uses an electronic interface to provide the LOC POTS reports, the trouble ticket is created, and a metallic line test is performed. The test results are displayed directly to the CLEC. The CLEC also receives the commitment time for restoration/repair of service using the same "back-office" system process as the manual ticket. The CLEC is able to review status of the repair events during the life of the ticket.

28. Maintenance reports received manually or electronically by the LOC for interconnection facilities or unbundled network elements are also entered into ECRS. However, a commitment time for restoration or repair of these services is not provided since repairs are performed on a "first-in, first-out" basis, depending upon the class of service in the following list of priority - DS3, DS1, DDS, and voice grade private line. Once the class of service is determined, the LOC Customer Testing Technicians perform testing of the circuit, and maintenance reports are dispatched to the appropriate organization for performance of the maintenance and repairs. While maintenance and repair activity is pending or underway on a maintenance report, CLECs may call the LOC for status reports and the estimated time when repairs will be completed. Once the CLEC enters mechanized maintenance reports on interconnection facilities or unbundled network elements, the flow for repair events is the same as manual trouble tickets. The CLEC may review status of these tickets via the electronic interface. This process is the same for retail customers, thus ensuring parity treatment for the CLECs.

The LOC's Ability to Meet Anticipated CLEC Demands

29. SWBT is committed to providing the LOC with sufficient resources to meet the needs and demands of the CLECs. SWBT has requested forecasts of expected transaction/order volumes from several of the largest CLECs. This information would allow the LOC to project trouble volumes from the CLECs. To date, however, very few CLECs have provided forecast information which can be used by the LOC to develop resource strategies.

30. Without forecasts from the CLECs, LOC management personnel have created a force model to manage anticipated force requirements based on volumes and capacities. Volumes are projected using the official SWBT Competitive Forecast. Historical data is then used to project report rates based on lines in service. Manual work time studies have been performed in the past and mechanized efficiency programs have also provided data that identify the number of productive hours per day per employee based on work content. These values have been used to determine the number of employees needed in the LOC to handle the expected maintenance report volumes. Actual lines in service and actual trouble volumes are tracked and compared to the forecast on a monthly basis. In addition, incoming trouble volumes are tracked on an hourly basis and employees' work hours are scheduled based on the needs of the business. The LOC has been able to determine "busy hours" and "busy day of week" based on the data that is available from the Automatic Call Distributor (ACD) that is in operation in the Center. Provisioning or installation data is tracked in the same manner.

31. A great deal of time and effort has been dedicated to tracking force requirements and making sure that an adequate and trained force is available to ensure quality and parity of service to the CLECs. Some of the basic data and assumptions that were used to develop the force model include: number of business days per month, total minutes per day per employee,

The information contained in this affidavit is true and correct to the best of my knowledge and belief.

_____
Linda D. Kramer

Subscribed and sworn to before me this _____ day of _____, 1998.

_____
NOTARY PUBLIC

My commission expires:

_____

productive minutes per day per employee, average handle time per report, average reports per day per employee, forecasted reports based on class of service, forecasted lines, forecasted report rate, reports received manually, mechanized reports, forecasted new service turn-ups based on class of service, and average turn-ups per employee per day based on class of service. **The LOC has staffed successfully during 1996 and 1997 to handle all trouble and provisioning requests received from CLECs using this method.** To handle the anticipated volumes for the end of year 1998 of 8,412 Interconnect Facilities, 135,083 Message Trunks, 23,183 Special Service Circuits, 23,180 UNEs, and 697,321 Resold POTS the LOC will need a total of 48 Customer Services Representatives, and 52 Customer Testing Technicians. Employees will be added to the payroll based on the actuals compared to the forecased volumes. The model provides the ability to trend the volumes. This provides a three month look to determine if force requirements should be accelerated to meet the demand. This method has allowed SWBT to provide the required capacity in a timely manner that is demanded based on the volumes expected.

The LOC's Efforts to Accommodate CLEC Requirements

32. As the CLEC's single point of contact for provisioning, maintenance and repair services, the LOC has gone to considerable effort to ensure that CLECs are able to fully utilize the services the LOC provides. CLECs are invited to attend individual orientation sessions with LOC operations personnel to aid in establishing good working relationships between the two companies. The orientation presentation provided to the CLECs is Attachment 3 to my affidavit. A tour of the LOC facilities and introduction to LOC personnel is also a part of the orientation process. Many CLECs including AT&T, MCI, ACSI, Time Warner, USLD, and Sprint have attended these sessions.

33. The LOC provides CLECs with contact or escalation lists and disaster recovery plans, and educates them on the LOC's internal work flows and processes (See Attachments 1 and 2). Escalation lists provide CLECs a handy reference for SWBT management contacts that may be called to expedite either a maintenance or provisioning request. The LOC has developed a disaster recovery plan to make sure that a back-up maintenance organization is available to provide service to the CLECs in case of a national, local, or weather related emergency that would interrupt the operations of the LOC. This information is provided to CLECs to assure them of our commitment of quality service 24 hours, 7 days a week, no matter what other conditions may exist. The plan ensures that the transition of the LOC functionality to the Kline Interexchange Carrier Center in case of disaster is transparent to the CLEC but that they will be notified the transition has occurred, what condition created the transition, and the anticipated return of the LOC to service. This information has been very well received by the CLECs.

34. Southwestern Bell has committed tremendous resources in both capital and employee dollars to ensure successful entry by the CLECs into the local market place. The efforts expended to provide equipment and personnel, to develop methods and procedures, and to provide service parity in the competitive arena has demonstrated the LOCs and SWBs dedication to this growing market.

The information contained in this affidavit is true and correct to the best of my knowledge and belief.

_____
Linda D. Kramer

Subscribed and sworn to before me this _____ day of _____, 1998.

_____
NOTARY PUBLIC

My commission expires:

_____

Attachment 1

ESCALATION LIST

LOC Interconnect	Mark Belser	817-212-4900
LOC Specials-INP/LNP	Vacant	817-212-5888
LOC POTS-Resale Mtce	Cathy Gregg	817-212-5300
LOC POTS-Resale Prov	Sharon Hutchison	817-212-5202
LOC Resold Spcl & UNE	Frankie Brazos	817-212-5400
Area Mgr-LOC	Candy Conway	817-212-5100
Area Mgr-Special Svcs	Danny Hilton	817-212-5500
Area Mgr-Service Mgr	Rene' Miller	817-212-4700
Dir. Local Operations Cntr	Linda Kramer	817-871-1500

SOUTHWESTERN BELL COMPANY
DISASTER RECOVERY PLAN

December 17, 1997
Summary

LOC DISASTER RECOVERY PLAN SUMMARY

A. Disaster Recovery Goals

The goals of this plan are to provide the LOC management the necessary resources to facilitate a high level of customer service in the event of a major disruption at the LOC in Texas. The plan defines procedures and information needed for both short term and long term solutions in providing the centers with capabilities at alternate locations.

B. Policy

In the event of a disaster, the following policies will be enforced:

1. The safety of all employees will be placed above all other objectives. No action will be authorized that will in any way jeopardize their safety.

2. All reasonable steps will be taken for protection of company property against further loss or damage.

C. Scope

The plan is designed for the ability to recover without access to the LOC or the North IECC and in some cases, assumes the loss of the center, the equipment and records contained therein. This plan contains information and provides emergency procedures to be initiated in order to minimize any disruption in services to our customers in the event one of the six situations described below occurs:

1. The LOC and staff are disabled due to a disaster -
   All numbers used by customers to report trouble would be routed immediately to the IECC in Klein, Texas for handling until the LOC's capabilities are restored.

2. The LOC is disable due to a disaster but the staff is unaffected -
   All numbers used by customers to report trouble would be routed immediately to the IECC in Klein, Texas for handling until the LOC's

capabilities are reestablished.

3. The communication links between the LOC and its primary switch are disabled -
   All numbers used by customers to report trouble would be routed immediately to the IECC in Klein, Texas for handling until the LOC's are reestablished at 1116 Houston, Fort Worth, Texas.

4. Disruptions that require evacuation of the LOC (i.e., bomb threat, fire alarm) -
   All numbers used by customers to report trouble would be routed to the IECC in Klein, Texas for handling until it can be established whether not the alarm is real or the facility is cleared of any other suspected hazard.

5. Loss of power to LOC -
   All numbers used by customers to report trouble would be routed to the IECC in Klein, Texas for handling until the LOC's capabilities are reestablished at 1116 Houston, Fort Worth, Texas.

6. One or more critical test systems used by the IECC are disabled -
   WFA - Use paper tickets to take trouble reports and relay information to Central Offices/ garages by phone. If WFA links to other systems are disabled, call the required dispatch centers, SSDAC or SCC and advise them of the trouble and what action may be required.

   SARTS
   TOS 4
   HLI

   Test Systems - Handle as if the circuit has no test access, contact the the Central Office and request test assist. Trouble reports would not be handed off unless the time required to get a technician to assist is unreasonable.

D. Information Items and Checklist

During a disaster recovery operation, the Disaster Recovery Team will have to make numerous decisions in a very short time frame. The information on which to base these decisions must be gathered and provided well in

advance of a disaster. These items are the minimum required for a recovery program that can be expected to work. The information will be documented throughout this plan including:

Document Plan of Procedures

1. Schedule of Notification
2. Operations and Maintenance Personnel
3. Individual Responsibilities
4. System and Applications Coordinators
5. Nature of Disasters and Corrective Actions

E. Documented Plan of Procedures

The Disaster Recovery Plan is the documented sequence of events as they are expected to occur. It itemizes actions to be performed and procedures necessary to perform those actions, resulting in minimization of the impact of disastrous disruption to the LOC.

F. LOC Backup Location

It is essential to the success of this plan that a backup site be established with equipment and circuitry in place. If a backup site is required due to an expended outage, the Fort Worth personnel will co-locate with the Klein IECC and the North Major Account Center in Richardson, Texas.

Distribution of Plan

This Disaster Recovery Plan will be distributed to each member of the recovery team and to Division, State, Local, and Headquarters Staffs which have responsibilities for administration and/or support of the LOC.

SOUTHWESTERN BELL COMPANY
DISASTER RECOVERY PLAN

December 17, 1997
Summary

LOC DISASTER RECOVERY PLAN
NOTIFICATION SCHEDULE

Should a major disruption occur at the LOC, the Site Recovery Coordinator or one of the designated alternates listed below will be contacted immediately by the first person aware of the disruption.

SITE RECOVERY COORDINATOR

Name:	Candy Conway
Title:	Area Manager-Svc. Mgmt. LOC
Home Phone:	817-379-0449
Office Phone:	817-212-5100
Pager:	888-266-0397

DESIGNATED ALTERNATES (in order of consideration)

First Alternate:

Name:	James Dryden
Title:	Area Manager-Special Services
Home Phone:	409-588-2296
Office Phone:	713-374-3404
Pager:	800-421-8215

Second Alternate:

Name:	Rene' Miller
Title:	Area Manager-Svc. Mgmt. LOC
Home Phone:	817-577-2477
Office Phone:	817-212-4700
Pager:	888-376-2483

Third Alternate:

Name:	Linda Kramer
Title:	Director IIO
Home Phone:	817-477-2541
Office Phone:	817-871-1500
Pager:	888-520-7198

SOUTHWESTERN BELL COMPANY
DISASTER RECOVERY PLAN

December 17, 1997
Summary

LOC DISASTER RECOVERY PLAN
TEAM RESPONSIBILITIES

PRIMARY TEAM

1. Access situation and damage to the operation.
2. Report conditions and provide status to upper management.
3. Contact Secondary Recovery Team.
4. Contact the Klein IECC and Market Areas to advise them of the situation.
5. Contact all LSPs and advise them of situation.
6. Coordinate and facilitate connectivity of all data communications and equipment. This includes connectivity to all OSS (Operational Support Systems) and TOS (Test Operations Systems).
7. Coordinate and facilitate telephone communications. This includes transfer of calls to the IECC in Klein, Texas or safe site.

SECONDARY TEAM

1. Contact all 1st level managers on the notification schedule and advise them of disaster.
2. Arrange for transportation of staff, if required, to safe site.
3. Contact technicians on notification schedule and provide them with reporting instructions.

EXECUTIVE RECOVERY TEAM

The Executive Recovery Team will provide general support such as interfacing with the CLECs and the media. This team will consist of the following:

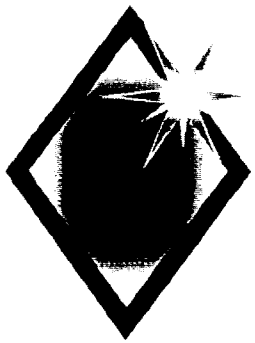
Ric Zamora
VP Local Operations

Stephen Carter
VP-General Manager-Special Markets

Ed Mueller
President & CEO SWB

Edward E. Whitacre Jr.
Chairman CEO SBC

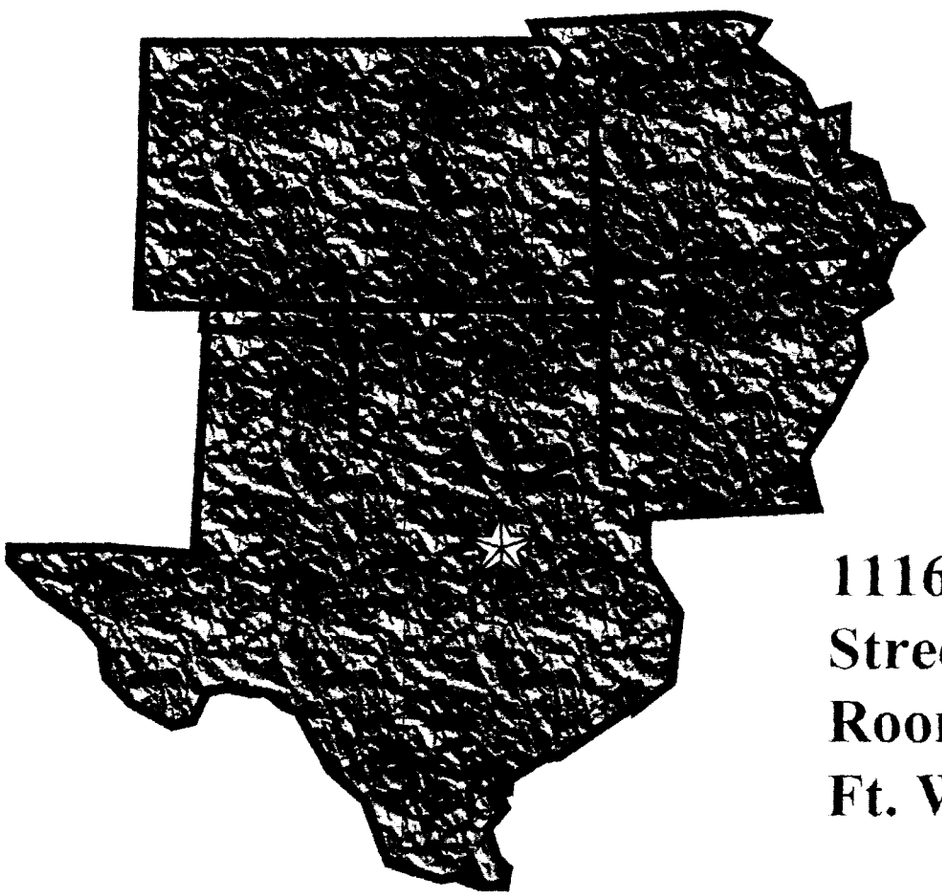
Attachment 3



Candy Conway
Area Manager
Special Services
LOC

Danny Hilton
Rene' Miller
Area Managers
Special Services

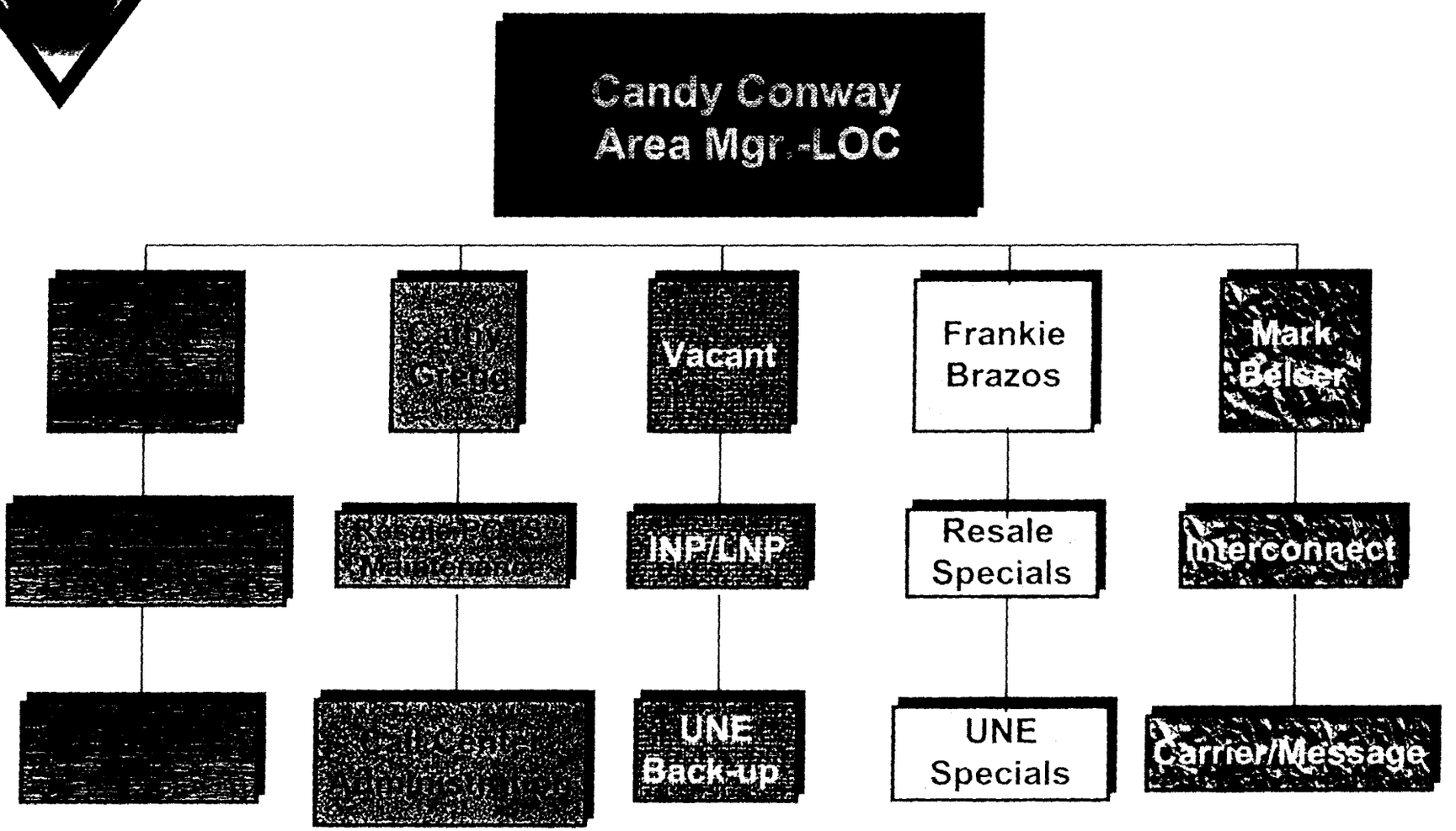
" Customers don't care how much we know, until they know how much we care"



1116 Houston
Street
Room 500
Ft. Worth, Texas

Attachment 3

LOCAL OPERATIONS CENTER (LOC) ORGANIZATION



POTS RESALE

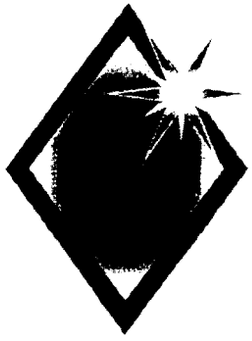
PROVISIONING:

- **POTS Resale Orders contain unique MCNs for recognition and system routing**
  - **RESLXXXXLSP USOC-XRERL**
- **CLEC is the *Customer of Record* for Service**
- **Company Missed Due Dates Monitored by LOC**
- **POTS Provisioning Handled by MA ICCs**
- **LSC is the POTS provisioning SPOC for CLECs**

POTS RESALE

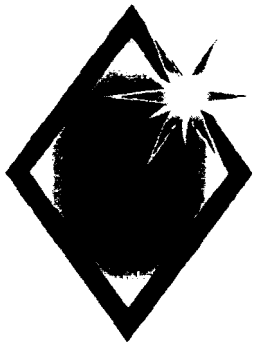
MAINTENANCE:

- **Grade of Service (90% answered in 20 Seconds)**
- **Trouble reports taken in** *ENHANCED CUSTOMER REPORTING SYSTEM* **(ECRS)**
- **Reports processed in LMOS/WFAC**
- **Testing done on-line by** *MECHANIZED LOOP TESTING* **(MLT)**
- **LOC is SPOC for CLEC maintenance**
- **Reports processed by using standard Handle Codes**
- **Commitments based on MA controlled clocks**
- **Demand status provided to CLEC's**
- **Mechanized daily fax sent to CLEC's on completed trouble**
- **Escalations handled as in CSBs**



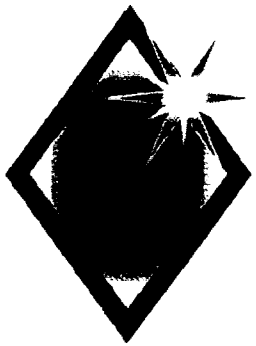
LOC PROVISIONING

- **Overall Control Office (OCO) for all *CLEC Customer of Record* Specials, Carrier and Message services**
- **Testing and turn-up when test access is available**
- **Coordination of test and turn-up when test access is not available**



LOC MAINTENANCE

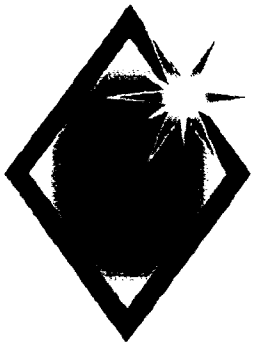
- Receive Trouble Reports
- Testing and Trouble Sectionalization
- Provide Demand Status
- Provide Demand Escalation
- 24 x 7 coverage



Local Operations Center

INP COORDINATION

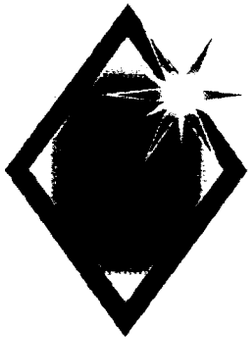
- **Receive order from LSC**
- **Check order for errors**
- **Coordinating participants**
  - **LSP**
  - **RCMAC**
  - **Frame**
  - **Field Technician**
- **Setup turn-up and time**



Unbundled Elements

NETWORK ELEMENTS:

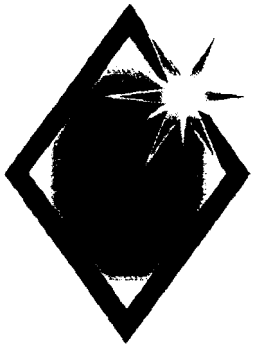
- **Local Loop Elements**
  - **Two-wire analog**
  - **Four-wire analog**
  - **Two-wire digital (BRI)**
  - **Four-wire digital (DS1 or PRI)**
  - **Network Interface Device (NID)**



Unbundled Elements

NETWORK ELEMENTS:

- **Local Switching**
  - **Switch ports**
  - **Tandem Switching**
  - **Common Transport**
- **Dedicated Transport**
- **Interoffice transmission facilities**



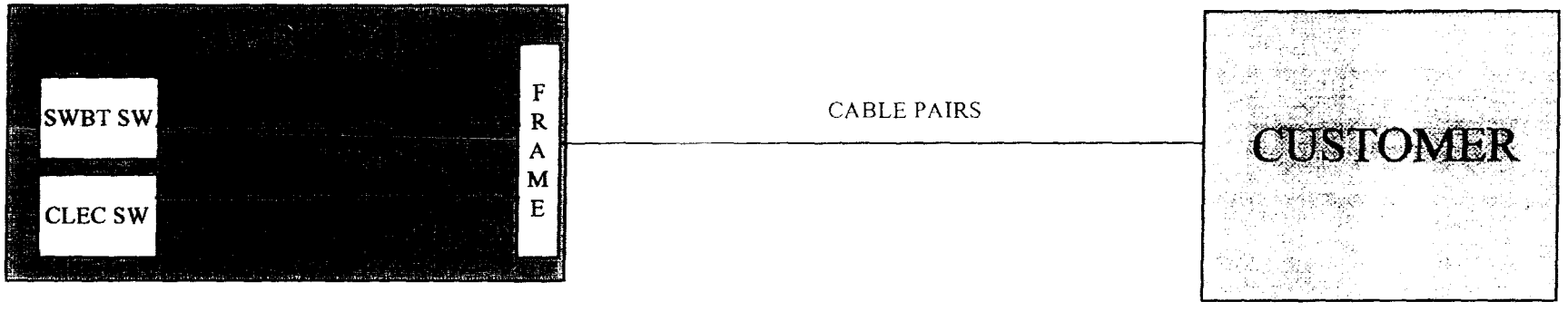
Unbundled Elements

NETWORK ELEMENTS:

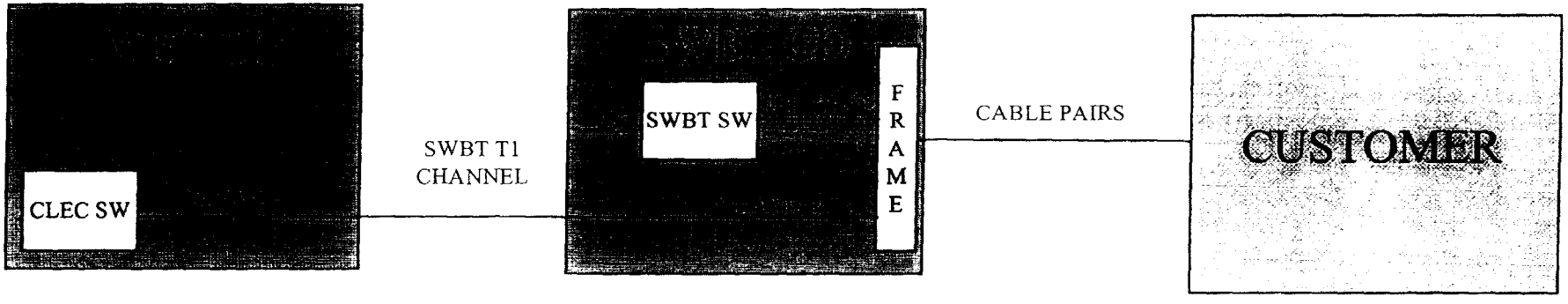
- **Signaling networks and call related databases**
- **Operations support systems functions**
- **Operator services and directory assistance**

Attachment 3

UNBUNDLED LOOP DRAWING



UNBUNDLED LOOP ONLY



UNBUNDLED LOOP WITH COMMON TRANSPORT